

DEC 31 2014

UNITED STATES DISTRICT COURT

David J. Bradley, Clerk of Court

for the

Southern District of Texas

United States of America)

v.)

Case No.

C-14-1391M

Teresa LITTLES)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/30/2014 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C § 841 (a) (1)

Knowingly, intentionally, and unlawfully
possess with intent to distribute a
controlled substance in Schedule I of
the Controlled Substance Act of 1970, to
wit; 6.14 Kilograms of heroin,
approximate gross weight.

This criminal complaint is based on these facts:

See Attachment A

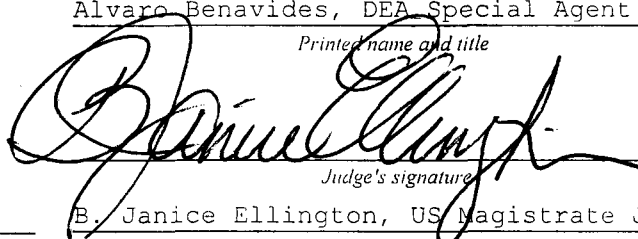
☒ Continued on the attached sheet.

Complainant's signature

Alvaro Benavides, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/31/2014City and state: Corpus Christi, TX

Judge's signature

B. Janice Ellington, US Magistrate Judge

Printed name and title

LITTLES, Teresa

Attachment A

On December 30, 2014, at approximately 1830 hours, Border Patrol Agent (BPA) Julio R. Zuniga was performing primary inspections duties at the Falfurrias Border Patrol Checkpoint on U.S. Highway 281 near Encino, Texas. BPA Daniel Cancino and his Service Canine Linda-E were also working inspection duties on the primary lane.

At that time, a white Chevrolet Impala bearing Texas License Plates FDL-0280, arrived at the United States Border Patrol Checkpoint and stopped for an immigration inspection of its passengers. BPA Zuniga questioned the driver, later identified as LITTLES, Teresa Rangel as to her citizenship and LITTLES stated that she was a United States Citizen. BPA Zuniga immediately noticed a strong odor emitting from the inside of the vehicle as if the vehicle was recently sprayed with air freshener. BPA Zuniga also noticed LITTLES was gripping the steering wheel tightly with one hand and utilizing the other hand to smoke a cigarette. BPA Zuniga noticed LITTLES would take several long, deep puffs of a cigarette in an abnormal manner and her hand would tremble as she would put the cigarette to her mouth. BPA Zuniga then asked LITTLES if she had a driver's license and she stated, "Yes" while handing him her Texas driver's license. Once again, BPA Zuniga noticed LITTLES hands were shaking as she handed him her driver's license which he interpreted as nervous behavior.

BPA Zuniga then attempted to ask LITTLES who the registered owner of the vehicle was and she stated it was her boyfriend's car. BPA Zuniga then asked LITTLES if she was from Dallas due to the Dallas county registration sticker on her windshield and she stated, "Yes." BPA Zuniga then asked LITTLES what she was doing down south and she stated she went to the valley to see family for a few days. BPA Zuniga then noticed there was no luggage in the vehicle so he asked LITTLES if she would consent to opening the trunk. LITTLES obliged and opened the trunk by pressing the button in the interior of the vehicle. A quick look in the trunk also revealed no luggage which aroused BPA Zuniga's suspicion that LITTLES may be involved in illicit activities.

During the immigration inspection, BPA Cancino notified BPA Zuniga that Linda-E was alerting to the trunk area of the vehicle. BPA Cancino then quickly examined the trunk area and also noticed a strong odor as if the trunk had been recently sprayed with air freshener which is a common tactic utilized by narcotic smugglers in order to conceal the odor of narcotics.

BPA Zuniga then began to ask LITTLES further questions concerning her travel and noticed LITTLES continued to be sitting in a stiff, rigid like seated position. LITTLES also began to fumble with her words as she spoke and her words became faint.

At that time, due to the positive canine alert, the vehicle was referred to the secondary inspection area for a more thorough inspection of the vehicle. In the secondary area, BPA Cancino performed a systematic search of the truck and canine Linda-E again alerted and indicated to the trunk area of the vehicle. After inspection of the trunk area, BPA Cancino noticed several bundles wrapped in black tape between the speaker area in the rear window deck.

One of the bundles was cut open by BPA Cancino revealing a brown powder. The powder was tested utilizing a Narcotics Identification System Kit which confirmed the substance to be heroin. A total of 9 bundles, weighing 6.14 kilograms, of heroin were seized from the vehicle. At that time, LITTLES was placed under arrest and escorted inside the Border Patrol Checkpoint.

BPA Zuniga read LITTLES her Miranda Rights as per Service Form I-214 and BPA John Leonard witnessed the reading of the rights. LITTLES signed the I-214 and stated that she understood her rights and was willing to provide a statement without an attorney present.

LITTLES stated she was offered \$2,000 to transport a significant amount of cash from McAllen to Dallas, Texas.

On December 31, 2014, SA Alvaro Benavides and TFO Todd Beach arrived at the checkpoint and spoke to LITTLES. LITTLES was issued her Miranda Rights again and she waived her rights and agreed to speak to agents. LITTLE stated that after she arrived in McAllen and it took several days for the supposed money to be ready for transport, she suspected that there was something illegal that was going to be hidden in the car.

AUSA Chad Cowen authorized the prosecution of LITTLES.

The amount of heroin, 6.14 kilograms, approximate gross weight, infers the intent to distribute.